

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:

APPLICATION OF INTERNATIONAL MINERAL
RESOURCES B.V. FOR AN ORDER TO TAKE
DISCOVERY PURSUANT TO 28 U.S.C. § 1782

Applicant.

Case No. _____

DECLARATION OF JONATHAN D. COGAN

EXHIBIT R

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

- - - - -X
IN RE:)
) 1:14-MC-00340 GK
APPLICATION OF INTERNATIONAL) JUDGE KESSLER
MINERAL RESOURCES, B.V. FOR AN)
ORDER TO TAKE DISCOVERY)
PURSUANT TO 28 U.S.C. 1782,)
) Applicant.)
- - - - -X

(CONFIDENTIAL PORTIONS NOT INCLUDED)

Videotaped Deposition of RINAT AKHMETSHIN

Washington, D.C.

Tuesday, April 7, 2015

9:41 a.m.

Job No. 141469

Pages: 1 - 274

Reported by: Dana C. Ryan, RPR, CRR

1 Videotaped Deposition of RINAT

2 AKHMETSHIN, held at the law offices of:

3

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8 (202) 664-1900

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15 Pursuant to agreement, before Dana C. Ryan,

16 Registered Professional Reporter, Certified

17 Realtime Reporter and Notary Public for the

18 District of Columbia.

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1 A P P E A R A N C E S

2

3 ON BEHALF OF IMR:

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1 A P P E A R A N C E S C O N T I N U E D

2

3 O N B E H A L F O F T H E D E P O N E N T :

4 K I M H O Y T S P E R D U T O , E s q u i r e

5 S p e r d u t o T h o m p s o n P L C

6 1 1 3 3 T w e n t i e t h S t r e e t , N o r t h w e s t

7 S e c o n d F l o o r

8 W a s h i n g t o n , D . C . 2 0 0 3 6

9 T e l e p h o n e : (2 0 2) 4 0 8 - 8 9 0 0

10 E m a i l : k s p e r d u t o @ s p e r d u t o t h o m p s o n . c o m

11

12

13 A l s o P r e s e n t :

14 M i k k o G o o d h i l l , V i d e o g r a p h e r

15 M a k s i m K u z m i n , I M R ' s R u s s i a n C o u n s e l

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1 general description, so there's -- because there's
2 a lot of legal activity happening in London with
3 the stock exchange and other things. The due
4 diligence is being done; there's a certain
5 informal kind of exchange, barter, of information
6 which is connected to pretty much everything.

7 I'm aware of Russian situation matters,
8 but I'm sure there's some Nigerian stuff going on
9 that's -- like every where else.

10 So I must say that there's -- in
11 addition to information, there's a lot of
12 misinformation and a lot -- a lot of forgeries as
13 well, actually, that's circulating.

14 So people -- it's -- it's very
15 informal, and it's not an entity which kind of
16 guarantees any kind of accuracy of those.

17 BY MR. SPERDUTO:

18 Q When you say "barter," what do you --
19 what do you mean by that?

20 A Barter means nonmonetary exchange.
21 People doing favors for each other.

22 Q And the -- the coin of the realm is
23 information; is that correct?

24 A It is information, yes.

25 Q Then -- and -- and do you participate